

Hearing Date: February 23, 2009 at 10:00 a.m. ET

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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| In re: | : Chapter 11 |
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| LEXINGTON PRECISION CORP., <u>et al.</u> , | : Case No. 08-11153 (MG) |
| | : |
| | : |
| Debtors. | : |
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**OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
WITNESS AND EXHIBIT LIST FOR HEARING ON: (I) MOTION
FOR AN ORDER PURSUANT TO SECTION 1121(d) OF THE
BANKRUPTCY CODE FURTHER EXTENDING THE
EXCLUSIVITY PERIODS AND (II) DEBTORS' MOTION FOR
AUTHORIZATION PURSUANT TO 11 U.S.C. §§ 105, 361, 362 AND
363(c) FOR CONTINUED USE OF CASH COLLATERAL**

TO: THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE

The Official Committee of Unsecured Creditors (the "Committee") of Lexington Precision Corporation, et al. (collectively, the "Debtors") hereby submit the following Witness List and Exhibit List for their case-in-chief for the February 23, 2009 hearing regarding the Debtors' motion for an order further extending the exclusivity periods in this case and the Debtors' motion regarding the cash collateral order. This list does not include testimony that may be elicited or exhibits that may be used in cross-examination or re-direct of witnesses.

WITNESS LIST

| WITNESS | NARRATIVE SUMMARY |
|--|---|
| 1. Jesse Ultz | <p>The direct examination testimony of Mr. Ultz, of Stout Risius Ross (“SRR”), will include but may not be limited to testimony regarding:</p> <ul style="list-style-type: none">▪ The Debtors’ projections and all revisions thereto.▪ The Debtors’ valuations and all revisions thereto.▪ Industry multiples.▪ How the Debtors’ actual performance compares to the Debtors’ projections/budgets.▪ Trends with respect to the Debtors’ cash balance, EBITDA, and sales. |
| 2. Nicholas Walsh (or another member of the Committee if Mr. Walsh is unavailable) | <p>The direct examination testimony of Mr. Walsh will include but may not be limited to testimony regarding:</p> <ul style="list-style-type: none">▪ The December 2007 presentation made by Debtors’ management to the ad hoc committee including, but not limited to, the alleged enterprise value and the projections included therein.▪ The Debtors’ proposed sale in January 2008 of the Medical (Rock Hill, South Carolina) division, and the ad hoc committee’s response thereto.▪ The possibility, or lack thereof, that the Debtors and the Committee will agree on a consensual plan of reorganization.▪ The Committee’s lack of faith in the guidance of the Debtors’ management.▪ The Debtors’ management’s representations regarding their negotiations with lenders and potential lenders concerning exit financing.▪ The Debtors’ continuous inability to meet budgets or forecasts. |

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| | <ul style="list-style-type: none"> ▪ The widely different views held by the Debtors and the Committee regarding valuation of the Debtors. ▪ Discussions and negotiations between the Debtors and the Committee. |
| 3. Stephen Altneau, corporate representative of Capital One Leverage Finance (by deposition) | <ul style="list-style-type: none"> ▪ The direct examination testimony of Mr. Altneau will include testimony regarding CapitalOne's negotiations with the Debtors regarding the availability of exit financing and the status of such negotiations as of the date of the deposition. Mr. Altneau will testify that, as of October 22, 2008, CapitalOne was no longer willing to finance 100% of the debt facility on a fully underwritten basis. In addition, the Debtors were further advised in December 2008 that CapitalOne as not willing to loan on the Debtors' real estate. As of the date of the deposition, January 29, 2009, whether CapitalOne was still interested in providing exit financing, in whole or in part, was "up in the air." |

EXHIBIT LIST

| EXHIBIT LETTER | DESCRIPTION |
|-----------------------|--|
| A | Comparison of the Debtors' Revised Projections |
| B | Comparison of Monthly Forecast to Actual Results |
| C | Chart Showing Historical and Projected Cash Balance |
| D | Chart Showing Debtor/W.Y Campbell's Changes in Valuation |
| E | Debtors Proposed Disclosure Statement, filed August 8, 2008 (submitted herein without exhibits) |
| F | September 19, 2008 Valuation of Lexington Precision Corporation (Draft), prepared by W.Y. Campbell |
| G | Second Amended Disclosure Statement, filed December 8, 2008 (submitted herein without exhibits) |

| EXHIBIT LETTER | DESCRIPTION |
|----------------|---|
| H | Chart of Debtors' EBITDA, Net Sales (1999-2008) |
| I | December 13, 2007 – Analysis of Various Sale Transactions |
| J | December 2007 Letter from W.Y. Campbell to Michael Lubin regarding summary of transactions proposed by prospective buyers |
| K | Trends in Multiples of W.Y. Campbell Comparable Companies |
| L | Lexington Precision Corp.'s 2003 Form 10-K |
| M | Lexington Precision Corp.'s 2004 Form 10-K |
| N | Lexington Precision Corp.'s 2005 Form 10-K |
| O | Lexington Precision Corp.'s 2006 Form 10-K |
| P | Lexington Precision Corp.'s 2007 Form 10-K |
| Q | Subpoena of Capital One Leverage Finance Corporation (Deposition Exhibit 1) |
| R | E-mail from Michael Lubin to Stephen Altneu, re: New Proposal, dated 02/06/2008 (Deposition Exhibit 2) |
| S | Proposal Letter from Stephen Altneu to Michael Lubin, dated 02/06/2008, unsigned (Deposition Exhibit 3) |
| T | E-mail from Stephen Altneu to Michael Burns, re: \$4mm Deposit Opportunity, dated 03/14/2008 (Deposition Exhibit 5) |

| EXHIBIT LETTER | DESCRIPTION |
|----------------|--|
| U | E-mail from Michael Lubin to Barry Fein, re: New Account, dated 03/14/2008 (Deposition Exhibit 6) |
| V | Draft Proposal Letter from Capital One Leverage Financial Corp. to Michael Lubin and Warren Delano, re: Financing Post-Chapter 11, dated 06/10/2008 (Deposition Exhibit 8) |
| W | Draft Proposal Letter from Capital One Leverage Financial Corp. to Michael Lubin and Warren Delano, re: Financing Post-Chapter 11, dated 07/25/2008 (Deposition Exhibit 10) |
| X | Proposal Letter from Capital One Leverage Financial Corp. to Michael Lubin and Warren Delano, re: Financing Post-Chapter 11, dated 07/29/2008 (Deposition Exhibit 11) |
| Y | E-mail from Stephen Altneu to Fein, Burns and Bailey, re: Lexington Valuation, dated 09/26/2008 (Deposition Exhibit 13) |
| Z | Lexington Precision Corp.'s Product Inventory at 06/30/2008 (Deposition Exhibit 17) |
| AA | List of Lexington's Fixed Assets (Deposition Exhibit 18) |
| BB | E-mail from Stephen Altneu to Barry Fein, re: Draft Debt Syndication Letter to Lubin, dated 10/22/2008 (Deposition Exhibit 19) |
| CC | E-mail from Michael Lubin to Crystal Bailey, re: Due Diligence Items, dated 10/23/2008 (Deposition Exhibit 20) |
| DD | Capital One Leverage Finance Corp.'s Credit Memo – Asset Based Transaction – Northeast Region, dated 10/23/2008 (Deposition Exhibit 21) |
| EE | E-mail from Perry Vavoulos to Burns, Bailey and Capasso, re: Lexington Financing, dated 10/25/2008 (Deposition Exhibit 22) |

| EXHIBIT LETTER | DESCRIPTION |
|-----------------------|---|
| FF | E-mail from Stephen Altneu to Fein and Bailey, re: Lexington Meeting, dated 12/01/2008 (Deposition Exhibit 23) |
| GG | E-mail from Michael Lubin to Altneu, Fein and Bailey, re: Lexington Financial Statements, dated 12/08/2008 (Deposition Exhibit 24) |
| HH | Memo re: Meeting to Discuss Managements Latest Projects and Restructuring Plans, undated (Deposition Exhibit 25) |
| II | E-mail from Crystal Bailey to Altneu and Burns, re: real Estate Transaction and Loans, dated 01/07/2009 (Deposition Exhibit 26) |
| JJ | E-mail from Crystal Bailey to Altneu and Fein, re: Lexington, dated 01/08/2009 (Deposition Exhibit 27) |
| KK | COLF Deal Summary, dated 01/07/2009 (Deposition Exhibit 28) |
| LL | Notes/History Document Prepared by Stephen Altneu (Deposition Exhibit 29) |
| MM | E-mail from Stephen Altneu to Michael Lubin, re: Proposal Letter, dated 06/10/2008 (Deposition Exhibit 37) |
| NN | E-mail from Michael Lubin to Stephen Altneu, re: Our Thoughts on Shape of the Financing, dated 12/12/2008 (Deposition Exhibit 42) |
| OO | E-mail from Michael Lubin to Stephen Altneu, re: Projected Financial Statements, dated 01/23/2009 (Deposition Exhibit 43) |
| PP | Letter from Stephen Altneu to Michael Lubin and Warren Delano, re: Reorganization Plan, dated 02/05/2009 (Deposition Exhibit 44) |
| QQ | Minutes, LPC Special Board of Directors Meeting, 01/11/2005 |

| EXHIBIT LETTER | DESCRIPTION |
|----------------|---|
| RR | Minutes, LPC Audit Committee Meeting, 03/29/2005 |
| SS | Minutes, LPC Audit Committee Meeting, 11/10/2005 |
| TT | Minutes, LPC Board of Directors Meeting, 12/13/2005 |
| UU | Minutes, LPC Audit Committee Meeting, 12/20/2005 |
| VV | Minutes, LPC Audit Committee Meeting, 031/28/2006 |
| WW | Minutes, LPC Organizational Meeting, 05/16/2006 |
| XX | Minutes, LPC Audit Committee Meeting, 11/13/2006 |

Dated: New York, New York
February 19, 2009

ANDREWS KURTH LLP

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